

FILED

SEP 19 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No.
DONNA MANKER,)
Defendant.)

4:13CR382 RWS/TIA

INDICTMENT

COUNT ONE

The Grand Jury charges:

On or about June 30, 2011, in the Eastern District of Missouri, the defendant,

DONNA MANKER,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on form entitled "Application Summary for Child's Insurance Benefits--Survivor Claim," defendant did state and represent and cause to be stated and represented that the minor child for whom she was applying to be the representative payee of Social Security benefits resided with her, when in truth and in fact, as **DONNA MANKER**, then well knew, the child did not live with her and had been removed from the family home by the State of Missouri

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

The Grand Jury charges:

On or about June 30, 2011, in the Eastern District of Missouri, the defendant,

DONNA MANKER,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the name, social security number and date of birth of J.K., during and in relation to the commission of the felony offenses of: making a false statement, Title 18, United States Code, Section 1001; social security fraud, Title 42, United States Code, Section 408(a)(7)(B); and, theft of government funds, Title 18, United States Code, Section 641.

In violation of Title 18, United States Code, Section 1028A.

COUNT THREE

The Grand Jury further charges that:

On or about July 20, 2011, in the Eastern District of Missouri, the defendant,

DONNA MANKER,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Social Security Administration Child's Insurance Benefits in the amount of \$1,474.00.

In violation of Title 18, United States Code, Section 641.

COUNT FOUR

The Grand Jury further charges that:

On or about August 17, 2011, in the Eastern District of Missouri, the defendant,

DONNA MANKER,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Social Security Administration Child's Insurance Benefits in the amount of \$1,474.00.

In violation of Title 18, United States Code, Section 641.

COUNT FIVE

The Grand Jury further charges that:

On or about October 3, 2011, in the Eastern District of Missouri, the defendant,

DONNA MANKER,

did willfully and knowingly steal, purloin, and convert to her use, and the use of another, money of the United States, that is, funds of the Social Security Administration, that being Social Security Administration Child's Insurance Benefits in the amount of \$1,934.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney